

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

CIVIL ACTION NO.:

\$2,744,739.17 IN FUNDS SEIZED)

FROM BANK OF AMERICA)

ACCOUNT NUMBER)

XXXXXX4215 IN THE NAME)

AMERICAN INTERNATIONAL)

EXPORT, INC.)

Defendant)

VERIFIED COMPLAINT FOR FORFEITURE

NOW COMES the United States of America and shows the Court the following in support of its Verified Complaint for Forfeiture.

NATURE OF THE ACTION

1. This is a civil forfeiture action against United States funds that are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) and 18 U.S.C. § 981(a)(1)(C).

THE DEFENDANT IN REM

2. The Defendant Funds consist of \$2,744,739.17 maintained in Bank of America, N.A., account number xxxxxx4215 (“BOA #4215”) in the name of American International Export.
3. The United States Secret Service (“USSS”) seized the Defendant Funds on or about October 19, 2020, pursuant to a federal seizure warrant.
4. The Defendant Funds are presently located in a secure account maintained by the USSS.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355.
6. This Court has *in rem* jurisdiction over the Defendant Funds pursuant to 28 U.S.C. § 1355(b)(1)(A) because the acts or omissions giving rise to the forfeiture occurred in this district.
7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

BASIS FOR FORFEITURE

8. The Defendant Funds are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) on the grounds that they constitute property involved in a transaction or an attempted transaction in violation of 18 U.S.C. §§ 1956 and/or 1957 or are property traceable to such property.
9. The Defendant Funds are also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because the funds constitute proceeds or were derived from proceeds traceable to violations of 18 U.S.C. § 1341 (mail fraud) and/or 18 U.S.C. § 1343 (wire fraud).

FACTUAL BACKGROUND

10. This action seeks to forfeit funds derived from various fraudulent activities, including robocall-based scams and other technology scams.
11. The funds were seized from a bank account controlled by American International Export.
12. The United States Secret Service (“USSS”) and Social Security Agency-Office of Inspector General (“SSA-OIG”) began investigating these scams when individuals in the Northern District of Georgia and across the United States were victimized.

Robocall Scam involving conviction

13. Robocall scams are enabled by mass phone-calling technology and spoofing.
14. In these scams, the victims are generally contacted by telephone, with elderly victims frequently targeted.
15. One type of these scams is mortgage modification schemes, in which callers impersonate bank employees and inform victims that they are eligible for mortgage modifications to improve their interest rate or payment amount.
16. After falsely asserting that the funds will be used as initial loan modification or as escrow payments, the mortgage modification callers instruct the victims to withdraw cash and then purchase money orders to be mailed to United States addresses, or to send money via Western Union or MoneyGram wires.
17. In social security impersonation scams, callers impersonate SSA officials or other law enforcement officials and allege issues with the victims' social security numbers ("SSN") associated with criminal activity.
18. The social security scam callers then induce the victims to send cash or money orders to addresses across the country to resolve the fictional legal issues associated with their SSN, typically threatening the victims with legal action.

19. The victims are told by the robocallers to mail cash or blank money orders to a money mule, who then makes an anonymous cash or money order deposit into the bank account.
20. A USSS investigation learned that there was a criminal enterprise in which the scam calls primarily originated in various foreign countries, including India and Dubai, and the victims mailed or deposited money to bank accounts and individuals within the United States.
21. Based on misrepresentations made during the scam calls, the victims, including Georgia residents, mailed money to a network of individuals who laundered funds on behalf of the overseas fraud network.
22. From about May 2019 until January 2020, Mehulkumar Manubhai Patel and Chaitali Dave laundered over \$500,000 sent by dozens of victims who fell prey to the scams outlined above.
23. Patel and Dave pleaded guilty in *United States v. Patel* (Case No. 1:20-cr-00204-AT-LTW) in the Northern District of Georgia on September 1, 2020, and October 6, 2020, respectively.
24. During the period in which Patel and Dave laundered over \$500,000, USSS agents became aware of a related criminal enterprise.
25. This related criminal enterprise appeared to involve fraudsters operating in Tehran and Dubai, as well as India (“the criminal scheme.”)

26. The criminal scheme and related actors fraudulently obtained the Defendant Funds which were deposited into BOA #4215.
27. The USSS and SSA-OIG determined that the criminal scheme also fraudulently obtained funds---again through mortgage modification and social security impersonation scams.
28. The investigation revealed that some of the transferred funds appeared to correspond to payments owed in connection with an illegal hawala.
29. Hawala is an informal method of transferring money which is used today as an alternative remittance channel that exists outside of traditional banking systems.
30. The criminal scheme facilitated hawala payments from Iran to the United States by using funds taken from the victims of their various scams.
31. This fraudulent scheme also utilized “money mules” to insulate themselves from the scams’ victims.
32. A money mule is an individual who transfers illegal funds electronically through various bank accounts, or converts the fraudulent proceeds into money orders, currency, debit cards, or virtual currency to conceal its source.

33. At the direction of the co-conspirators, money mules also make deposits via the mail or deposit funds directly into specified bank accounts to facilitate the movement of funds from one state to another.

Mortgage Modification Scam

34. The criminal fraud scheme which produced the Defendant Funds involves several victims from the Northern District of Georgia, including E. T.
35. On or around the fall of 2019, E.T. received a call from an individual who claimed to be from her mortgage company.
36. The caller offered E.T. an opportunity to refinance her mortgage.
37. The caller gave E.T. instructions on what she needed to do to initiate the refinance.
38. On or about November 5, 2019, following the caller's instructions, E.T. wired \$1,021.00 to a fictitious name at a Florida address.
39. On or about November 29, 2019, E.T. wired an additional \$721.00 to a second fictitious name in Florida.
40. E.T. did not receive the refinancing paperwork the caller had promised.
41. E.T. then contacted the bank that held her mortgage and learned that she had been the victim of a scam.

42. On November 30, 2019, Karla Spiker, a money mule for the criminal scheme, used a false identity to pick up the \$721.00 that had been wired by E.T. and transferred the money into the criminal hawala scheme.
43. On February 3, 2021, Spiker pleaded guilty in *United States v. Karla Spiker* in Case No. 1:20-cr-00373-1, in the Northern District of Georgia.
44. In another instance, victim C.N. in New York City, New York, received a phone call in which he was told to send money orders for what he believed was a mortgage modification for his home.
45. On September 16, 2020, a \$900.00 money order from C.N. based on fraudulent misrepresentations was deposited into BOA #4215.
46. Similarly, on September 24, 2020, a \$192.00 money from C.N., which was sent based on fraudulent misrepresentations, was deposited into BOA #4215.
47. In addition, on September 24, 2020, a money mule was instructed by the criminal scheme to deposit \$25,000.00 into BOA #4215.
48. This deposit alone consisted of cash and blank money orders from 26 individuals who did not know the mule to whom they sent their money and who were all scam victims.

49. There are numerous additional examples of individuals who were defrauded of funds by mortgage modification scams and whose funds are now part of the Defendant Funds.

Social Security Scam

50. In or around July 2020, N. G., an elderly victim in New York City, New York, began receiving calls from someone claiming to be “Investigator Bob Crystal from Social Security Administration Department of Investigation.”
51. The caller falsely told N.G. that she needed to send money to the District Attorney.
52. The caller then gave N.G. instructions on where to send the money.
53. N.G. mailed five cash packages and one wire transfer, totaling \$93,159.35.
54. On or about August 28, 2020, N.G. wired \$39,000 to a SunTrust Bank account held in the name of D.W., who lives in Marietta, Ga.
55. D.W. is likely a money mule for the criminal scheme.
56. On September 1, 2020, N.G. mailed \$10,000.00 in cash to known criminal scheme mule S.M. in Cleveland, Ohio.
57. On September 24, 2020, a member of the criminal scheme directed S.M. to make \$25,000.00 in deposits into BOA #4215 in amounts of \$8,500.00, \$9,000.00 and \$7,500.00.

- 58. The deposits which S. M. made into BOA Account #4215 included money orders for \$75.00, \$532.00 and \$950.00 which S.M. bought with cash received from victim N.G. via mailed payments.
- 59. In a separate instance, J.F., a resident of the Northern District of Georgia, sent two money orders to money mules.
- 60. The money orders from J. F. were based on fraudulent misrepresentations and were deposited into BOA #4215.

American International Export and Bank of America Account #4215

- 61. BOA #4215 was opened on or around July 14, 2005, under the name Ram Investment Group, Inc.
- 62. The corporate signature card for the BOA account listed the title of the account as “Ram Investment Group Inc. d/b/a American International Export.”
- 63. The BOA account was designated as the “operations account.”
- 64. Ram Investment Group Inc.’s address is 2722 Holmes Road, Houston, Texas 77051-1022.
- 65. The operations center for American International Export is 2722 Holmes Road, Houston, Texas 77051-1022.
- 66. American International Export does not have locations in states other than Texas.

67. The registered agents for Ram Investment Group Inc. d/b/a/ American International Export are Ramon Martinez and Mohammad Awad, who are from Houston, Texas.
68. The public internet page for American International Export indicates that it is a warehouse-type clothing business that sells rags and clothing to foreign countries.
69. American International Export (“AIE”) is not a retail store, instead it sells rags and used clothing overseas to countries like India, Pakistan, Dubai, and Nicaragua.

Illegal Cash Deposits into BOA #4215

70. As stated above, the Defendant Funds in BOA #4215 are proceeds from victims of scams and/or funds that were involved in money laundering transactions.
71. From August 2019 through September 2020, at least \$1,387,239.37 in cash was deposited into BOA #4215.
72. These cash deposits are inconsistent with AIE’s business model and are consistent with being proceeds of fraudulent activity.
73. Since AIE does not operate a retail store in the United States and its customer base is overseas, there appears to be no legitimate business reason

for these cash deposits, which were made from all over the United States into BOA #4215.

74. The table below outlines the details of many of the cash deposits into BOA #4215, which appear to be linked to fraud, money laundering or illegal activity. These deposits are consistent with the manner in which money mules operate:

Date	Cash Deposited	Bank Address	City	State
8/27/2019	\$39,700.00	3704 Old Spanish Trl	Houston	TX
8/27/2019	\$20,000.00	3704 Old Spanish Trl	Houston	TX
8/30/2019	\$40,000.00	3704 Old Spanish Trl	Houston	TX
8/30/2019	\$28,423.56	3516 Pecan Blvd	McAllen	TX
8/30/2019	\$2,880.00	3704 Old Spanish Trl	Houston	TX
9/4/2019	\$27,000.00	3704 Old Spanish Trl	Houston	TX
9/4/2019	\$16,344.53	3516 Pecan Blvd	McAllen	TX
9/4/2019	\$8,000.00	12747 Central Ave	Chino	CA
9/10/2019	\$25,100.00	3704 Old Spanish Trl	Houston	TX
9/17/2019	\$7,500.00	2930 Jamacha Rd	El Cajon	CA
9/18/2019	\$33,748.83	3516 Pecan Blvd	McAllen	TX

9/24/2019	\$7,000.00	512 Fletcher Pkwy	El Cajon	CA
9/26/2019	\$20,000.00	3704 Old Spanish Trl	Houston	TX
9/27/2019	\$25,462.78	3516 Pecan Blvd	McAllen	TX
9/30/2019	\$11,000.00	3704 Old Spanish Trl	Houston	TX
10/3/2019	\$22,768.00	3704 Old Spanish Trl	Houston	TX
10/8/2019	\$31,723.66	3516 Pecan Blvd	McAllen	TX
10/10/2019	\$20,000.00	3704 Old Spanish Trl	Houston	TX
10/11/2019	\$12,890.00	3704 Old Spanish Trl	Houston	TX
10/16/2019	\$10,000.00	3704 Old Spanish Trl	Houston	TX
10/18/2019	\$23,516.36	3516 Pecan Blvd	McAllen	TX
10/24/2019	\$20,000.00	3704 Old Spanish Trl	Houston	TX
10/25/2019	\$24,087.00	3704 Old Spanish Trl	Houston	TX
10/28/2019	\$28,552.78	3516 Pecan Blvd	McAllen	TX
10/29/2019	\$22,600.00	3704 Old Spanish Trl	Houston	TX
10/31/2019	\$20,000.00	3704 Old Spanish Trl	Houston	TX
11/4/2019	\$36,067.52	3516 Pecan Blvd	McAllen	TX
11/6/2019	\$9,000.00	1707 E Capitol Expy	San Jose	CA
11/8/2019	\$300.00	1701 Bellevue Rd	Atwater	CA

11/12/2019	\$18,153.34	3516 Pecan Blvd	McAllen	TX
11/12/2019	\$2,000.00	3704 Old Spanish Trl	Houston	TX
11/18/2019	\$27,066.76	3516 Pecan Blvd	McAllen	TX
11/21/2019	\$18,198.51	3516 Pecan Blvd	McAllen	TX
11/25/2019	\$20,450.00	3704 Old Spanish Trl	Houston	TX
11/26/2019	\$7,080.00	3704 Old Spanish Trl	Houston	TX
11/26/2019	\$1,000.00	3704 Old Spanish Trl	Houston	TX
11/27/2019	\$20,000.00	3704 Old Spanish Trl	Houston	TX
12/2/2019	\$9,359.69	3516 Pecan Blvd	McAllen	TX
12/9/2019	\$27,215.38	3516 Pecan Blvd	McAllen	TX
12/9/2019	\$21,000.00	3704 Old Spanish Trl	Houston	TX
12/16/2019	\$18,000.00	3704 Old Spanish Trl	Houston	TX
12/18/2019	\$15,695.81	3516 Pecan Blvd	McAllen	TX
12/26/2019	\$300.00	3328 W Touhy Ave	Skokie	IL
12/31/2019	\$237.00	1100 Alhambra Blvd	Sacramento	CA
1/8/2020	\$19,240.82	3516 Pecan Blvd	McAllen	TX
1/8/2020	\$1,200.00	407 Egg Harbor Rd	Sewell	NJ
1/8/2020	\$175.00	11501 Santa Monica Blvd	West Los Angeles	CA

1/9/2020	\$740.00	835 8th Ave	New York	NY
1/9/2020	\$200.00	7207 E Independence Blvd	Charlotte	NC
1/9/2020	\$155.00	1616 E Bessemer Ave	Greensboro	NC
1/15/2020	\$13,284.67	3516 Pecan Blvd	McAllen	TX
1/16/2020	\$19,000.00	3704 Old Spanish Trl	Houston	TX
1/21/2020	\$18,000.00	3704 Old Spanish Trl	Houston	TX
1/24/2020	\$40,000.00	3516 Pecan Blvd	McAllen	TX
1/24/2020	\$3,063.00	600 Broadhollow Rd	Melville	NY
1/27/2020	\$16,102.32	3516 Pecan Blvd	McAllen	TX
1/27/2020	\$16,000.00	3704 Old Spanish Trl	Houston	TX
1/28/2020	\$20,500.00	3704 Old Spanish Trl	Houston	TX
1/30/2020	\$17,222.21	3516 Pecan Blvd	McAllen	TX
2/14/2020	\$39,000.00	3704 Old Spanish Trl	Houston	TX
2/14/2020	\$28,256.58	3516 Pecan Blvd	McAllen	TX
2/14/2020	\$4,000.00	3704 Old Spanish Trl	Houston	TX
2/20/2020	\$9,401.26	3516 Pecan Blvd	McAllen	TX
2/24/2020	\$34,740.00	3704 Old Spanish Trl	Houston	TX
2/27/2020	\$25,000.00	3704 Old Spanish Trl	Houston	TX

3/5/2020	\$4,950.00	15891 Sheridan St	Davie	FL
3/10/2020	\$26,000.00	3704 Old Spanish Trl	Houston	TX
3/17/2020	\$32,700.00	3704 Old Spanish Trl	Houston	TX
6/2/2020	\$9,000.00	3704 Old Spanish Trl	Houston	TX
6/5/2020	\$2,212.00	6344 Telephone Rd	Houston	TX
6/12/2020	\$26,290.00	3704 Old Spanish Trl	Houston	TX
6/29/2020	\$20,500.00	3704 Old Spanish Trl	Houston	TX
6/29/2020	\$4,925.00	3704 Old Spanish Trl	Houston	TX
7/23/2020	\$3,000.00	3440 Bell St STE 328	Amarillo	TX
7/27/2020	\$29,800.00	6607 Woodlands Pkwy	The Woodlands	TX
8/5/2020	\$4,824.00	16350 Pines Blvd	Pembroke Pines	FL
8/7/2020	\$5,176.00	16350 Pines Blvd	Pembroke Pines	FL
8/11/2020	\$19,590.00	3704 Old Spanish Trl	Houston	TX
8/25/2020	\$9,243.00	4023 Cedar Springs Rd	Dallas	TX
8/25/2020	\$7,500.00	1521 Springfield Ave	Maplewood	NJ
9/2/2020	\$4,000.00	2196 Forest Ave	Staten Island	NY
9/15/2020	\$23,090.00	3704 Old Spanish Trl	Houston	TX
9/18/2020	\$1,250.00	6880 Race Track Rd	Bowie	MD

Fraudulent Deposits Of More than \$25,000.00 in Money Orders in BOA #4215

75. In addition to the cash deposits, BOA #4215 also received over \$25,000 in suspicious money order deposits.
76. Like the cash deposits, the money order deposits into BOA #4215 are inconsistent with AIE's business model and are consistent with deposits made because of fraudulent misrepresentations.
77. Many of the money orders which were deposited into BOA #4215 were related to the criminal scheme outlined above.
78. The following chart shows some of the fraudulently obtained Defendant Funds which were deposited into BOA #4215 via money orders:

Date Received	Sender Initials	Sender City	Sender State	Amount	Description
9/5/2020	LA	Annison	AL	\$904.00	United States Postal Office ("USPS") Money Order ("MO")
9/8/2020	TB	Akron	OH	\$911.00	USPS MO
9/10/2020	CN	Bronx	NY	\$192.00	USPS MO
9/10/2020	LP	Randolph	MA	\$594.00	USPS MO
9/11/2020	KW	Middle River	MD	\$569.00	USPS MO
9/11/2020	PJ	Apple Valley	CA	\$855.00	USPS MO

9/11/2020	TN	Westland	MI	\$781.00	Western Union ("WU") MO
9/12/2020	UC MO	Cleveland	OH	\$950.00	USPS MO
9/12/2020	LL	White Lake	MI	\$786.00	USPS MO
9/14/2020	AW	Chadbourn	NC	\$732.00	USPS MO
9/15/2020	MB	Cerritos	CA	\$750.00	USPS MO
9/16/2020	ET	Brooklyn	NY	\$700.00	WU MO
9/16/2020	ET	Brooklyn	NY	\$350.00	WU MO
9/16/2020	RB	Shellsburg	IA	\$732.00	USPS MO
9/16/2020	CN	Bronx	NY	\$900.00	USPS MO
9/16/2020	JK	Belvidere	IL	\$751.00	MoneyGram
9/16/2020	MC	Erie	PA	\$1,000.00	MoneyGram
9/16/2020	JS	Central Tslip	NY	\$289.00	USPS MO
9/18/2020	DS	Southhaven	MS	\$400.00	USPS MO
9/18/2020	LB	Camden	DE	\$503.00	MoneyGram
9/18/2020	MP	Kissimmee	FL	\$501.00	USPS MO
9/19/2020	LA	Waimea	HI	\$525.00	USPS MO
9/19/2020	KW	Teaneck	NJ	\$950.00	Chase MO
9/19/2020	KW	Teaneck	NJ	\$1,000.00	Chase MO
9/21/2020	VM	Houston	TX	\$311.00	Chase MO
9/21/2020	JF	Bethlehem	GA	\$170.00	USPS MO
9/21/2020	EN	Ewabeach	HI	\$700.00	USPS MO
9/23/2020	AR	Tahlequah	OK	\$587.00	USPS MO
9/23/2020	AR	Tahlequah	OK	\$1,000.00	USPS MO
9/23/2020	AR	Tahlequah	OK	\$1,000.00	USPS MO
9/23/2020	GB	Vineland	NJ	\$500.00	USPS MO
9/23/2020	IL	Shelton	WA	\$1,000.00	USPS MO
9/23/2020	IL	Shelton	WA	\$500.00	USPS MO
9/23/2020	IL	Shelton	WA	\$1,000.00	USPS MO
9/23/2020	IL	Shelton	WA	\$1,000.00	USPS MO
9/24/2020	UC MO	Cleveland	OH	\$532.00	USPS MO
9/24/2020	UC MO	Cleveland	OH	\$75.00	USPS MO
			TOTAL DEPOSITS	\$25,000.00	

At Least \$1,759,770.05 In Counter Deposits of Fraudulent Proceeds into BOA #4215

79. A review of all activity in BOA #4215 shows that from August 26, 2019, until September 26, 2020, there were approximately 3046 counter deposits made into BOA #4215 from various states.
80. A counter deposit is generally made in person at the bank's counter and is received by a member of the bank's staff.
81. Since AIE is not a retail store and is located only in Texas, there appears to be no legitimate business purpose for the volume or dollar amount of counter deposits into BOA #4215.
82. These fraudulent counter deposits total at least \$1,759,770.05 and are consistent with deposits from money mules who are engaged in fraudulent activity and/or money laundering.
83. The table below outlines the details of many of the counter deposits of \$5,000 or more into BOA #4215 which appear to be linked to fraud, money laundering, or illegal activity and have no legitimate business purpose:

Date	Amount	City	State
9/25/2020	\$7,500.00	Mayfield Heights	OH
9/25/2020	\$6,620.00	Marysville	CA

9/24/2020	\$8,500.00	Mayfield Heights	OH
9/15/2020	\$7,020.00	Detroit	MI
9/14/2020	\$21,300.00	New York	NY
9/9/2020	\$20,000.00	New York	NY
8/24/2020	\$29,875.00	Los Angeles	CA
8/12/2020	\$11,000.00	Falls Church	VA
8/7/2020	\$5,176.00	Pembroke Pines	FL
8/5/2020	\$27,000.00	Falls Church	VA
7/24/2020	\$16,000.00	New York	NY
7/24/2020	\$6,610.00	New York	NY
7/21/2020	\$11,265.00	New York	NY
7/21/2020	\$5,000.00	Chicago	IL
7/16/2020	\$9,165.00	New York	NY
7/15/2020	\$18,000.00	Irvine	CA
7/15/2020	\$17,000.00	New York	NY
7/14/2020	\$13,100.00	New York	NY
7/14/2020	\$10,000.00	New York	NY
7/9/2020	\$24,750.00	Coral Gables	FL

7/8/2020	\$21,000.00	Falls Church	VA
7/6/2020	\$13,700.00	New York	NY
6/30/2020	\$20,000.00	New York	NY
6/19/2020	\$5,000.00	New York	NY
6/9/2020	\$20,700.00	New York	NY
6/3/2020	\$5,000.00	Elk Grove	CA
5/14/2020	\$13,000.00	Falls Church	VA
5/1/2020	\$6,470.00	Brooklyn	NY
5/1/2020	\$6,340.00	New York	NY
4/3/2020	\$5,100.00	New York	NY
4/3/2020	\$5,000.00	New York	NY
3/24/2020	\$13,060.00	New York	NY
3/16/2020	\$10,000.00	Falls Church	VA
3/12/2020	\$13,975.00	New York	NY
3/12/2020	\$6,000.00	Lodi	CA
3/12/2020	\$5,500.00	Lodi	CA
3/11/2020	\$5,000.00	Lodi	CA
3/6/2020	\$5,289.55	Fountain Valley	CA

3/5/2020	\$25,000.00	Falls Church	VA
3/3/2020	\$15,020.00	New York	NY
3/3/2020	\$15,000.00	New York	NY
2/26/2020	\$26,687.00	Brooklyn	NY
2/26/2020	\$12,662.00	New York	NY
2/26/2020	\$6,000.00	Garden City	MI
2/24/2020	\$5,000.00	Dearborn Heights	MI
2/20/2020	\$6,807.00	New York	NY
2/10/2020	\$6,000.00	New York	NY
2/6/2020	\$15,300.00	Hialeah	FL
2/6/2020	\$5,000.00	Lodi	CA
2/5/2020	\$15,000.00	New York	NY
2/5/2020	\$5,000.00	Lodi	CA
2/4/2020	\$41,224.00	New York	NY
2/3/2020	\$10,000.00	Irvine	CA
1/27/2020	\$5,000.00	Marysville	CA
1/21/2020	\$5,000.00	New York	NY
1/16/2020	\$15,000.00	Bronx	NY

1/13/2020	\$7,984.00	New York	NY
1/7/2020	\$5,400.00	Rocky Hill	NJ
12/20/2019	\$6,372.00	New York	NY
12/18/2019	\$20,500.00	New York	NY
12/18/2019	\$5,800.00	New York	NY
12/17/2019	\$8,000.00	New York	NY
12/16/2019	\$5,000.00	New York	NY
12/11/2019	\$12,020.00	Tucker	GA
12/11/2019	\$10,000.00	New York	NY
12/10/2019	\$5,000.00	Dearborn Heights	MI
12/10/2019	\$5,000.00	Dearborn	MI
11/18/2019	\$13,000.00	Irvine	CA
11/13/2019	\$21,915.00	Belleville	NJ
11/13/2019	\$10,000.00	Dearborn	MI
11/12/2019	\$6,000.00	Lady Lake	FL
11/6/2019	\$9,000.00	San Jose	CA
11/5/2019	\$18,000.00	New York	NY
11/5/2019	\$9,800.00	Los Gatos	CA

11/4/2019	\$7,700.00	San Jose	CA
10/29/2019	\$15,223.00	San Diego	CA
10/29/2019	\$13,967.00	San Diego	CA
10/29/2019	\$10,810.00	San Diego	CA
10/29/2019	\$6,234.00	San Diego	CA
10/28/2019	\$7,900.00	New York	NY
10/28/2019	\$5,400.00	New York	NY
10/25/2019	\$5,000.00	San Jose	CA
10/25/2019	\$5,000.00	San Jose	CA
10/24/2019	\$9,000.00	New York	NY
10/22/2019	\$10,000.00	New York	NY
10/22/2019	\$10,000.00	New York	NY
10/21/2019	\$11,000.00	Jackson Heights	NY
10/21/2019	\$10,579.00	New York	NY
10/18/2019	\$5,000.00	Baileys Crossroads	VA
10/15/2019	\$5,000.00	Marysville	CA
10/8/2019	\$8,000.00	Lynbrook	NY
10/3/2019	\$13,595.00	Charlotte	NC

10/1/2019	\$5,000.00	Charlotte	NC
10/1/2019	\$5,000.00	Dearborn Heights	MI
10/1/2019	\$5,000.00	Dearborn Heights	MI
9/30/2019	\$11,700.00	Irvine	CA
9/30/2019	\$2,000.00	Yuba City	CA
9/26/2019	\$5,000.00	Tracy	CA
9/26/2019	\$5,000.00	Tracy	CA
9/24/2019	\$7,000.00	El Cajon	CA
9/18/2019	\$20,000.00	New York	NY
9/17/2019	\$22,992.00	New York	NY
9/17/2019	\$9,500.00	New York	NY
9/17/2019	\$7,500.00	El Cajon	CA
9/16/2019	\$13,470.00	New York	NY
9/16/2019	\$7,500.00	New York	NY
9/13/2019	\$14,000.00	New York	NY
9/12/2019	\$6,120.00	Tucson	AZ
9/10/2019	\$5,530.00	New York	NY
9/9/2019	\$13,630.00	New York	NY

9/9/2019	\$9,584.00	New York	NY
9/6/2019	\$15,000.00	Belleville	NJ
9/6/2019	\$6,500.00	Schenectady	NY
9/4/2019	\$8,000.00	Chino	CA
9/4/2019	\$200.00	Yonkers	NY
8/29/2019	\$8,400.00	New York	NY
8/28/2019	\$19,126.00	New York	NY

CONCLUSION

84. As outlined above, the Defendant Funds in BOA #4215 are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) on the grounds that they constitute property involved in a transaction or an attempted transaction in violation of 18 U.S.C. §§ 1956 and/or 1957, or are property traceable to such property.
85. The Defendant Funds are also subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) because the funds constitute proceeds or were derived from proceeds traceable to violations of 18 U.S.C. § 1341 (mail fraud) and 18 U.S.C. § 1343 (wire fraud).

WHEREFORE, Plaintiff prays:

- (1) that the Court forfeit the Defendant Funds to the United States of America;
- (2) that the Court award Plaintiff the costs of this action; and
- (3) that Plaintiff have such other and further relief as the Court deems just and proper under the facts and circumstances of this case.

This 22nd day of February, 2021.

Respectfully submitted,

KURT R. ERSKINE
ACTING UNITED STATES ATTORNEY

Cynthia B. Smith
s/ Cynthia B. Smith

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

CIVIL ACTION NO.:

\$2,744,739.17 IN FUNDS SEIZED)

FROM BANK OF AMERICA)

ACCOUNT NUMBER)

XXXXXX4215 IN THE NAME OF)

AMERICAN INTERNATIONAL)

EXPORT)

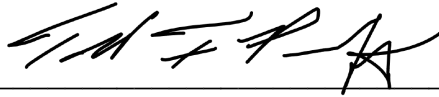
Defendant.)

VERIFICATION OF COMPLAINT FOR FORFEITURE

I, Senior Special Agent Todd F. Porinsky, have read the Complaint for Forfeiture in this action and state that its contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case and upon information obtained from other law enforcement personnel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 22nd day of February, 2021.

A handwritten signature in black ink, appearing to read 'T. F. Porinsky', written over a horizontal line.

SENIOR SPECIAL AGENT TODD F. PORINSKY
UNITED STATES SECRET SERVICE